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*Counsel for Defendant Telnix LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION, as  
assignee of individuals who are Covered Persons,  
JANE DOE-1, a law enforcement officer, JANE  
DOE-2, a law enforcement officer, and PETER  
ANDREYEV,

Plaintiffs,

v.

TELNYX LLC, RICHARD ROES 1-10, fictitious  
names of unknown individuals and ABC  
COMPANIES 1-10, fictitious names of unknown  
entities,

Defendants.

Civil Action No. 2:24-cv-04354

**DEFENDANT’S APPLICATION AND  
ORDER FOR EXTENSION OF TIME  
TO ANSWER, MOVE OR  
OTHERWISE REPLY**

Pursuant to Local Civil Rule 6.1(b), application is hereby made for an Order extending the time within which Defendant Telnix LLC (“Defendant”) may answer, move or otherwise reply to the Complaint filed by Plaintiffs on February 8, 2024, for a period of fourteen (14) days, to and including April 18, 2024, and it is represented that:

1. No previous extension has been obtained;
2. A copy of the Complaint was served on Defendant on February 27, 2024;
3. The notice of removal was timely filed on March 28, 2024; and
4. The time for Defendant to answer, move or otherwise reply would expire, at the earliest, on April 4, 2024.

Respectfully submitted,



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*Attorneys for Defendant Telnix LLC*

SO ORDERED this \_\_\_\_\_ day of April, 2024.

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Deputy Clerk